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April 6, 2022

Via ECF

Hon. Thomas J. McAvoy
Senior U.S. District Judge
Federal Building & U.S Courthouse
15 Henry Street
Binghamton, NY 13901

Re: United States v. Delaney
1:20-CR-000335-TJM
*Letter Request Approving Modification to Home Detention to Permit
Neighborhood Walk*

Dear Judge McAvoy,

I represent the Defendant, Jacob Delaney and the above matter. Jacob is currently released on home detention and I write to request permission for Jacob to take walks around his neighborhood with his dog while accompanied by one or both of his parents. Jacob would limit these walks to a set duration, frequency, and route in coordination with pretrial services. A similar request was previously approved by Magistrate Judge Stewart in May 2020 (see ECF Doc. Nos. 19 and 20), but I have been advised that pretrial services requires renewed authorization from the Court for Jacob to take these walks. I have conferred with the Government about this request and the Government has no objection.

Respectfully,

Iseman PLLC

By:



Scott Iseman
Attorney

Encl.

cc: All parties via ECF

